



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMR/GN
F. #2018R02232

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 10, 2023

By Email

Henry E. Mazurek, Esq.
Ilana Haramati, Esq.
Meister Seelig & Fein LLP
125 Park Avenue, 7th Floor
New York, NY 10017

Re: United States v. Jacob Daskal
Criminal Docket No. 21-110 (NGG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. Specifically, please find images of messages and a redacted report regarding those messages and additional information, Bates-numbered DASKAL002132-DASKAL002136. Please note that the government does not presently intend to rely on these materials during its case-in-chief. The government also requests reciprocal discovery from the defendant.

In addition, the government is voluntarily providing the enclosed document, marked 3500-MS-3, which is designated "Sensitive Discovery Material" and must be handled pursuant to the Protective Order entered by the Court on April 9, 2021. See Dkt. No. 18. The government does not concede that these materials fall within the scope of Brady v. Maryland, 373 U.S. 83 (1963) but nevertheless produces these statements in an abundance of caution. In addition, the government does not concede the relevance, materiality, or admissibility of the disclosed information.

Please contact us if you have any questions.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Erin Reid
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